

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

JENNIFER RYAN,

Plaintiff,

CIVIL ACTION NO.: 4:22-cv-559

v.

JURY TRIAL DEMANDED

PAYPAL INC.,

Defendant.

**PROPOSED ORDER GRANTING PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT**

Before the Court is Plaintiff Jennifer Ryan's Motion for Default Judgment (Dkt. #[to be assigned]), filed March 31, 2025, seeking default judgment against Defendant PayPal Holdings, Inc. ("PayPal") under Federal Rule of Civil Procedure 55(a). Having reviewed the motion, the record, and applicable law, the Court finds as follows:

1. Plaintiff filed her Amended Complaint (Dkts. #49) on February 24, 2025, asserting claims against PayPal, including constitutional violations, collusion with state actors under (18 U.S.C. § 241), and damages totaling \$85 million, supported by 48 exhibits of new evidence.
2. PayPal failed to plead or otherwise defend against the Amended Complaint within the time required by Fed. R. Civ. P. 15(a)(3), due March 10, 2025—47 days of silence as of March 31, 2025—despite opportunity under the stay (Dkt. #25).
3. PayPal's persistent silence, even after Plaintiff's reasonable settlement offer of March 10, 2025, constitutes a failure to defend, as a stay permits limited response without excusing total inaction (*Klay v. United Healthgroup, Inc.*, 376 F.3d 1092, 1102-03 (11th Cir. 2004)).
4. The Court cannot advocate for an absent party (*United States v. Sineneng-Smith*, 140 S. Ct. 1575, 1579 (2020)), and PayPal's failure triggers default under Rule 55(a).

5. By its silence, PayPal admits well-pleaded facts under Fed. R. Civ. P. 8(b)(6), including its ban and leak of Plaintiff's account information (Dkts. #9, Exhibit A; #49, Exhibit C1), her resulting "media interest" imprisonment (Dkt. #49, Exhibit Q), state actor ties to FBI/FinCEN (Dkt. #58), and waiver of arbitration as alleged (Dkt. #49, Section V), establishing liability for \$85 million as pleaded (Dkt. #49) (Lewis v. Lynn, 236 F.3d 766, 768 (5th Cir. 2001)).

**IT IS THEREFORE ORDERED** that:

1. Plaintiff Jennifer Ryan's Motion for Default Judgment (Dkt. #[to be assigned]) is **GRANTED**.
2. Default judgment is entered in favor of Plaintiff Jennifer Ryan against Defendant PayPal Holdings, Inc. in the amount of **\$85,000,000.00**, as pleaded in Dkt. #49.
3. The stay of proceedings (Dkt. #25) is **LIFTED**.
4. This case is **CLOSED**, subject to any post-judgment motions or proceedings as necessary.

**SIGNED** this \_\_\_\_ day of \_\_\_\_\_, 2025, at Sherman, Texas.

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AMOS L. MAZZANT III  
UNITED STATES DISTRICT JUDGE